

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

LORIE DUFF §  
*Plaintiff,* §  
vs. § C.A. 4:20-cv-3430  
FRONTIER AIRLINES, INC. AND §  
ABM AVIATION, INC. §  
*Defendants.* §  
§

**DEFENDANT ABM AVIATION, INC.'S RULE 26(a)(1) INITIAL DISCLOSURES**

TO: Plaintiff, Lorie Duff, through her attorney of record Kevin Forsberg, Esq., THE FORSBERG LAW FIRM, P.C., 15899 HWY. 105 W, MONTGOMERY, TEXAS 77356.

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendant ABM Aviation, Inc (“ABM”) provides the following disclosures:

**A. Federal Rule of Civil Procedure 26(a)(1)(A)(i):**

**The name and, if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment:**

The following individuals may have information as to Plaintiffs' claims and the Incident at issue:

1. Lorie Duff

Ms. Lorie Duff is the Plaintiff in this action. She has knowledge about the alleged incident, including injuries claimed, the nature and extent of those claimed injuries, and damages related to them.

2. Aylancia Lillie

Ms. Aylancia Lille was a Customer Care Agent for ABM Aviation, Inc. at the time of the alleged incident. She may have knowledge about the general claim being made by Plaintiff. Her last known address is 1015 Hummingbird Point Lane, Houston, Texas 77090; Telephone number is (346) 316-5301.

3. Misty Cannon

Ms. Misty Cannon was a Customer Care Supervisor for ABM Aviation, Inc. at the time of the alleged incident. She may have knowledge about the general claim being made by Plaintiff. Her last known address is 1301 Lakeland Drive, Apt. 205, Liberty, Texas 77575; Telephone number is (936) 346-2515.

ABM reserves the right to supplement this response should additional information become available.

**B. Federal Rule of Civil Procedure 26(a)(1)(A)(ii):**

**A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment:**

ABM reserves the right to supplement this response should additional information become available.

**C. Federal Rule of Civil Procedure 26(a)(1)(A)(iii):**

**A computation of each category of damages claimed by the disclosing party – who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extend of injuries suffered:**

Defendant denies that Plaintiff is entitled to any damages.

**D. Federal Rule of Civil Procedure 26(a)(1)(A)(iv):**

**For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment:**

See Bates Number DUFF ABM000001 – DUFF ABM000038.

Defendant's Initial Disclosures under F.R.C.P. 26(a)(1)(A) are made based on information reasonably available now. There may be other individuals currently not identified now who may have knowledge of relevant facts. Since discovery has just begun, Defendant has not determined which, if any experts it may employ to provide testimony in this case. Finally, these Initial Disclosures do not constitute waiver of any work product protection that may be afforded the defense and are made without prejudice to any issue or argument made or to be made in the future.

Respectfully submitted,

ROSE LAW GROUP PLLC

/s/ Marc Michael Rose

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**CERTIFICATE OF SERVICE**

This is to certify that on January 29, 2021, a true and correct copy of the foregoing document was served by electronic service on:

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/s/ Marc Michael Rose  
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